

**CWA INDUSTRIAL USER FILE REVIEW  
PART OF PRETREATMENT COMPLIANCE AUDIT  
U.S ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

Purpose: Pretreatment Compliance Inspection, Industrial User Audit

Facility: East Chicago Sanitary District  
5200 Indianapolis Boulevard  
East Chicago, IN 46312

Date(s) of Inspection: June 9-11, 2021

EPA Representative: Newton Ellens, Pretreatment Program Manager, 312-353-5562

IDEM Representative: Natalie Maupin, Pretreatment Coordinator, 317-985-3715

Facility Representatives: Kenneth Myers, Director of Wastewater Operation  
Jose Cisneros, Pretreatment Coordinator  
Henry Padilla, Pretreatment Assistant

**Inspector:**

**Inspector Signature:** \_\_\_\_\_

**Report Date:** \_\_\_\_\_

**Approver Name & Title:**

**Approver Signature** \_\_\_\_\_

**Approval Date:** \_\_\_\_\_

June 9-11, 2021, the United States Environmental Protection Agency joined the Indiana Department of Environmental Management (IDEM) on a Pretreatment Compliance Audit (PCA) of the East Chicago Sanitary District (ECSD). A portion of the PCA included a compliance review for select industrial users in the pretreatment program.

#### Industrial User (IU) Information:

Safety-Kleen Systems  
601 Riley Road  
East Chicago, IN 46312

Safety-Kleen Systems (Safety-Kleen) is a centralized waste treatment facility. Its average discharge flow rate is 147,827 gallons per day. East Chicago Sanitary District (ECSD) issued Permit No. 901 to Safety-Kleen. Permit 901 has an effective date of November 15, 2018, and an expiration date of August 21, 2023.

During the PCA, information was collected and reviewed on the IU Safety-Kleen. Information that was collected and reviewed is listed in Appendix A.

#### Issuance of IU Control Mechanism

- The statement of non-transferability in Permit 901 does not include a requirement to provide a copy of the existing permit to the new owner.
- Permit 901 includes multiple categorizations. The applicable categorization is not clear:
  - Page 1 of the permit authorizes Safety-Kleen to discharge wastestreams under 40 C.F.R. § 437.47. (Pretreatment Standards for new sources, Subpart D-Multiple Wastestreams, Centralized Waste Treatment Point Source Category).
  - Page 3 of the permit includes a table of two different categorical limits:
    - 40 C.F.R. § 437.25 (Pretreatment Standards for existing sources, Subpart B-Oils Treatment and Recovery); and
    - 40 C.F.R. § 442.25 (Pretreatment Standards for existing sources, Subpart B-Rail Tank Cars Transporting Chemical and Petroleum Cargos, Transportation Equipment Cleaning Point Source Category).<sup>1</sup>
- Page 3 of Permit 901 only includes daily categorical limits. Monthly categorical limits are not included.
- Permit 901 does not describe the required process to seek a monitoring waiver for pollutants not present nor expected to be present.
- The required IU sample frequency in Permit 901 is “≤ 1/6 months,” or less than or equal to once every six months. This requirement gives Safety-Kleen the discretion to submit

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<sup>1</sup> Under 40 C.F.R. § 437.1(b)(10), on-site wastewater generated from cleaning transportation equipment, along with wastewater not subject to cleaning transportation equipment is subject to 40 C.F.R. Part 437.

sample analysis reports to ECSD less than once every six months (as required in 40 C.F.R. § 403.12(e)(1)).

- The following sample requirements in Permit 901 are not in line with requirements under 40 C.F.R. § 403.12(g)(3). In addition, ECSD did not document its decision to allow alternate sampling:
  - Page 6: requirement for composite samples to be time-proportional, and
  - Page 6: requirement to take phenol composite samples.
- Page 8 of Permit 901 requires Safety-Kleen to report the total monthly discharge flow each month (separate from self-monitoring reports), instead of requiring Safety-Kleen to include flow data in self-monitoring reports, as required by 40 C.F.R. §§ 403.12(e)(1) and 403.12(g)(1).
- Page 8 of Permit 901 requires self-monitoring reports to be submitted in an electronic deliverable format. Mr. Myers, Director of Wastewater Operations, stated that ECSD included this requirement because it considered having its IUs to submit self-monitoring reports electronically. ECSD, however, decided against this requirement.
- Permit 901 does not include a requirement for Safety-Kleen to make pretreatment records available to ECSD and EPA for review and copying.
- Permit 901 authorizes Safety-Kleen to discharge dilute streams (sanitary and non-contact cooling water) from its sampling location. ECSD, however, did not use the categorical wastestream formula (under 40 C.F.R. § 403.6(e)) to determine alternative categorical limits for Permit 901.
- Permit 901 does not include a requirement to notify ECSD about a significant change in discharge under 40 C.F.R § 403.12(j).
- Permit 901 does not require Safety-Kleen to follow its slug discharge control plan.

#### Control Authority Compliance Monitoring

- The Safety-Kleen IU file does not include an ECSD inspection report for 2020.
- According to ECSD's November 14, 2019 inspection report for Safety-Kleen, Safety-Kleen and ECSD do not collect samples at the same location.

#### Control Authority Enforcement Activities

- ECSD did not issue Notices of Violation to Safety-Kleen for exceedances found through self-monitoring. Below is a list of self-reported exceedances:

Report Date	Sample Date	Pollutant Parameter	Pretreatment Limit (mg/L)	Analytical Result (mg/L)
June 17, 2020	May 29, 2020	available cyanide	0.019	0.330
June 12, 2020	June 10, 2020	available cyanide	0.019	0.810
			0.019	0.870
June 9, 2020	May 29, 2020	available cyanide	0.019	0.330

- ECSD's significant noncompliance (SNC) determination only accounts for SNC under technical review criteria (TRC). It does not account for chronic SNC violations.
- ECSD did not publish Safety-Kleen for SNC violations committed in 2020.
- ECSD continually issues Notices of Violation (NOVs) for mercury and available cyanide violations. ECSD has not escalated enforcement for repeated exceedances. Below is a list of NOVs ECSD issued to Safety-Kleen:

<b>NOV date</b>	<b>Sample date</b>	<b>Pollutant Parameter</b>	<b>Pretreatment Limit (mg/L, except for pH, which is S.U.)</b>	<b>Analytical Result (mg/L, except for pH, which is S.U.)</b>
June 3, 2021	May 10, 2021	available cyanide	0.019	0.13
		mercury	0.0002	0.0005
May 17, 2021	April 28, 2021	available cyanide	0.019	0.12
		mercury	0.0002	0.0007
April 19, 2021	March 29, 2021	available cyanide	0.019	0.048
April 4, 2021	April 12, 2021	available cyanide	0.019	0.28
		Oil and grease	117	160
		Phenol	0.6	4.91
March 31, 2021	March 17, 2021	available cyanide	0.019	0.30
March 1, 2021	February 11, 2021	available cyanide	0.019	0.10
February 17, 2021	January 27, 2021	available cyanide	0.019	0.12
January 28, 2021	January 12, 2021	available cyanide	0.019	0.22
		Ammonia	134	336
December 15, 2020	November 5, 2020	available cyanide	0.019	0.043
November 13, 2020	October 27, 2020	available cyanide	0.019	0.27
		mercury	0.0002	0.00032
		Oil and grease	117	278
October 28, 2020	October 12, 2020	Available cyanide	0.019	0.21
October 15, 2020	September 28, 2020	available cyanide	0.019	0.16
		phenols	0.96	16.60
		pH	5 to 10	11.7

<b>NOV date</b>	<b>Sample date</b>	<b>Pollutant Parameter</b>	<b>Pretreatment Limit (mg/L, except for pH, which is S.U.)</b>	<b>Analytical Result (mg/L, except for pH, which is S.U.)</b>
September 28, 2020	September 10, 2020	available cyanide	0.019	0.14
September 8, 2020	August 20, 2020	available cyanide	0.019	0.11
August 27, 2020	August 12, 2020	available cyanide	0.019	0.22
		mercury	0.0002	0.00031
July 31, 2020	July 15, 2020	available cyanide	0.019	0.23
June 1, 2020	May 21, 2020	available cyanide	0.019	0.030
April 27, 2020	April 13, 2020	available cyanide	0.019	0.077
		mercury	0.0002	0.00045
April 16, 2020	March 30, 2020	available cyanide	0.019	0.082
March 27, 2020	March 19, 2020	available cyanide	0.019	0.12
March 16, 2020	February 25	available cyanide	0.019	0.12
February 28, 2020	February 12, 2020	available cyanide	0.019	0.15
		Bis (2-ethylhexyl) phthalate	0.267	0.66
January 27, 2020	January 14, 2020	Available cyanide	0.019	0.23
		phenols	0.96	2.74
October 31, 2019	October 16, 2019	available cyanide	0.019	0.078
October 1, 2019	September 12, 2019	available cyanide	0.019	0.32
September 16, 2019	August 29, 2019	available cyanide	0.019	0.12
August 14, 2019	July 29, 2019	available cyanide	0.019	0.16
August 5, 2019	July 17, 2019	available cyanide	0.019	0.27
July 8, 2019	June 24, 2019	available cyanide	0.019	0.078
July 2, 2019	June 17, 2019	available cyanide	0.019	0.055

NOV date	Sample date	Pollutant Parameter	Pretreatment Limit (mg/L, except for pH, which is S.U.)	Analytical Result (mg/L, except for pH, which is S.U.)
June 12, 2019	May 23, 2019	mercury	0.0002	0.0004
		available cyanide	0.019	0.650
April 23, 2019	April 15, 2019	available cyanide	0.019	0.13
April 5, 2019	March 26, 2019	available cyanide	0.019	0.46
April 4, 2019	March 26, 2019	Oil and grease	117	118
		mercury	0.0002	0.0004
March 5, 2019	February 25, 2019	available cyanide	0.019	0.099
January 24, 2019	January 15, 2019	available cyanide	0,019	0.120

#### Industrial User Self-Monitoring

- ECSD does not require Safety-Kleen to submit self-monitoring reports as required under 40 C.F.R. § 403.12. Self-monitoring reporting deficiencies are listed below:
  - Under Safety-Kleen's reporting schedule, Safety-Kleen should have provided a semi-annual report in December 2020. ECSD, however, did not provide Safety-Kleen's semi-annual report for this period.
  - Safety-Kleen collects composite phenol samples. 40 C.F.R. § 403.12(g)(3) requires grab sample for phenols.
  - Safety-Kleen does not certify each report as required under 40 C.F.R. § 403.12(l).
  - Safety-Kleen does not notify ECSD about discharge violations, as required under 40 C.F.R. § 403.12(g)(2). Nor does Safety-Kleen resample its discharge after each violation.

#### Areas of Concern

40 C.F.R. Part	File Reviews
40 C.F.R. § 403.8(f)(1)(iii)(B)(2)	The statement of non-transferability in Permit 901 does not include a requirement to provide a copy of the existing permit to the new owner.
40 C.F.R. § 403.8(f)(2)(iii)	Permit 901 includes multiple categorizations. The applicable categorization is not clear.
40 C.F.R. § 403.8(f)(1)(iii)(B)(3)	Permit 901 only includes daily categorical limits. Monthly categorical limits are not included.

40 C.F.R. § 403.8(f)(1)(iii)(B)(4)	Permit 901 does not describe the required process to seek a monitoring waiver for pollutants not present nor expected to be present.
40 C.F.R. § 403.8(f)(2)(iv)	The required IU sample frequency in Permit 901 is “≤ 1/6 months,” or less than or equal to once every six months. This requirement gives Safety-Kleen the discretion to submit sample analysis reports to ECSD less than once every six months (as required in 40 C.F.R. § 403.12(e)(1)).
40 C.F.R. § 403.8(f)(1)(iii)(B)(4)	Sample requirements in Permit 901 are not in line with requirements under 40 C.F.R. § 403.12(g)(3). In addition, ECSD did not document its decision to allow alternate sampling.
40 C.F.R. § 403.8(f)(2)(iv)	Page 8 of Permit 901 requires Safety-Kleen to report the total monthly discharge flow each month (separate from self-monitoring reports), instead of requiring Safety-Kleen to include flow data in self-monitoring reports (as required by 40 C.F.R. §§ 403.12(e)(1) and 403.12(g)(1)).
40 C.F.R. § 403.8(f)(1)(iii)(B)(4)	Permit 901 requires self-monitoring reports to be submitted in an electronic deliverable format. This requirement, however, does not apply.
40 C.F.R. § 403.8(f)(1)(iii)(B)(4)	Permit 901 does not include a requirement for Safety-Kleen to make pretreatment records available to ECSD and EPA for review and copying.
40 C.F.R. § 403.8(f)(2)(iii)	Permit 901 authorizes Safety-Kleen to discharge dilute streams (sanitary and non-contact cooling water) from its sampling location. ECSD, however, did not use the categorical wastestream formula (under 40 C.F.R. § 403.6(e)) to determine alternative categorical limits for Permit 901.
40 C.F.R. § 403.8(f)(1)(iii)(B)(4)	Permit 901 does not include a requirement to notify ECSD about a significant change in discharge under 40 C.F.R. § 403.12(j).
40 C.F.R. § 403.8(f)(1)(iii)(B)(6)	Permit 901 does not require Safety-Kleen to follow its slug discharge control plan.
40 C.F.R. § 403.8(f)(2)(v)	The Safety-Kleen IU file does not include an ECSD inspection report for 2020.
40 C.F.R. § 403.8(f)(5)	ECSD did not issue Notices of Violation to Safety-Kleen for exceedances found through self-monitoring.
40 C.F.R. § 403.8(f)(2)(viii)	ECSD’s significant noncompliance (SNC) determination only accounts for SNC under technical review criteria (TRC). It does not account for chronic SNC violations.
40 C.F.R. § 403.8(f)(2)(viii)	ECSD did not publish Safety-Kleen for SNC violations in 2020.
40 C.F.R. § 403.8(f)(5)	ECSD continually issues NOV’s for mercury and available cyanide violations. ECSD has not escalated enforcement for repeated exceedances.

40 C.F.R. § 403.8(f)(2)(iv)	Under Safety-Kleen's reporting schedule, Safety-Kleen should have provided a semi-annual report in December 2020. ECSD, however, did not provide Safety-Kleen's semi-annual report for this period.
40 C.F.R. § 403.8(f)(2)(iv)	Safety-Kleen collects composite phenol samples. 40 C.F.R. § 403.12(g)(3) requires grab sample for phenols.
40 C.F.R. § 403.8(f)(2)(iv)	Safety-Kleen does not certify each report as required under 40 C.F.R. § 403.12(l).
40 C.F.R. § 403.8(f)(2)(iv)	Safety-Kleen does not notify ECSD about discharge violations, as required under 40 C.F.R. § 403.12(g)(2). Nor does Safety-Kleen resample its discharge after each violation.



## Appendix A

### Information Collected

1. Safety-Kleen self-monitoring reports:
  - a. June 17, 2020 correspondence from Michael Radcliffe, Senior Manager Environmental Compliance, Safety-Kleen Systems, Inc. to Nickie Geros, East Chicago Sanitary District
  - b. June 12, 2020 correspondence from Alex Csaszar, Project Manager, ALS Environmental to Jim Satterlee, Safety-Kleen Systems
  - c. June 9, 2020, Report of Laboratory Analysis, from Les Arnold, Senior Project Manager, ALS Environmental to Jim Satterlee, Safety-Kleen Systems, Inc.
  - d. June 11, 2019, correspondence from Michael Radcliffe, Senior Manager Environmental Compliance, Safety-Kleen Systems, Inc. to Nickie Geros, East Chicago Sanitary District
2. East Chicago Sanitary District Notices of Violation sent to Safety-Kleen Systems, Inc.:
  - a. June 3, 2021 Notice of Violation from Jose Cisneros, Pretreatment Coordinator, East Chicago Sanitary District to Mori Sorenson, VP Compliance Manager, Safety-Kleen Systems
  - b. May 17, 2021 Notice of Violation from Jose Cisneros, Pretreatment Coordinator, East Chicago Sanitary District to Mori Sorenson, VP Compliance Manager, Safety-Kleen Systems
  - c. April 19, 2021 Notice of Violation from Jose Cisneros, Pretreatment Coordinator, East Chicago Sanitary District to Mori Sorenson, VP Compliance Manager, Safety-Kleen Systems
  - d. April 4, 2021 Notice of Violation from Jose Cisneros, Pretreatment Coordinator, East Chicago Sanitary District to Mori Sorenson, VP Compliance Manager, Safety-Kleen Systems
  - e. March 31, 2021 Notice of Violation from Kenneth Myers, Director of Sanitary District, East Chicago Sanitary District to Mori Sorenson, VP Compliance Manager, Safety-Kleen Systems, Inc.
  - f. March 1, 2021 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
  - g. February 17, 2021 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
  - h. January 28, 2021 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
  - i. December 15, 2020 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.

- j. November 13, 2020 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
- k. October 28, 2020 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
- l. October 15, 2020 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
- m. September 28, 2020 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
- n. September 8, 2020 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
- o. August 27, 2020 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
- p. July 31, 2020 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
- q. June 1, 2020 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
- r. April 27, 2020 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
- s. April 16, 2020 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
- t. March 27, 2020 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
- u. March 16, 2020 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
- v. February 28, 2020 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
- w. January 27, 2020 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.

- x. October 31, 2019 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
  - y. October 1, 2019 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
  - z. September 16, 2019 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
  - aa. August 14, 2019 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
  - bb. August 5, 2019 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
  - cc. July 8, 2019 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
  - dd. July 2, 2019 Notice of Violation from Henry Padilla, Pretreatment Assistant, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
  - ee. June 12, 2019 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
  - ff. April 23, 2019 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
  - gg. April 5, 2019 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
  - hh. April 4, 2019 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
  - ii. March 5, 2019 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
  - jj. January 24, 2019 Notice of Violation from Kenneth Myers, Compliance Manager, East Chicago Sanitary District to Michael Radcliffe, Senior Compliance Manager, Safety-Kleen Systems, Inc.
3. Safety-Kleen Systems, Inc. Responses to East Chicago Sanitary District Notices of Violation:
- a. June 4, 2021 correspondence from Mori Sorenson, VP of Environmental Compliance to Henry Padilla, East Chicago Sanitary District

- b. June 3, 2021 correspondence from Mori Sorenson, VP of Environmental Compliance to Henry Padilla, East Chicago Sanitary District
- c. June 1, 2021 correspondence from Mori Sorenson, VP of Environmental Compliance to Henry Padilla, East Chicago Sanitary District
- d. May 17, 2021 correspondence from Mori Sorenson, VP of Environmental Compliance to Henry Padilla, East Chicago Sanitary District
- e. April 22, 2021 correspondence from Mori Sorenson, VP of Environmental Compliance to Henry Padilla, Pretreatment Assistant, East Chicago Sanitary District
- f. March 8, 2021 correspondence from Mori Sorenson, VP of Environmental Compliance to Henry Padilla, East Chicago Sanitary District
- g. December 28, 2020 correspondence from Michael Radcliffe, Senior Manager Environmental Compliance to Henry Padilla, Pretreatment Assistant, East Chicago Sanitary District
- h. December 22, 2020 correspondence from Michael Radcliffe, Senior Manager Environmental Compliance to Henry Padilla, Pretreatment Assistant, East Chicago Sanitary District
- i. November 17, 2020 correspondence from Michael Radcliffe, Senior Manager Environmental Compliance to Henry Padilla, Pretreatment Assistant, East Chicago Sanitary District
- j. September 22, 2020 correspondence from Michael Radcliffe, Safety Kleen Systems, Inc. to Henry Padilla, Pretreatment Assistant, East Chicago Sanitary District
- k. November 17, 2020 correspondence from Michael Radcliffe, Senior Manager Environmental Compliance, Safety Kleen Systems, Inc. to Henry Padilla, Pretreatment Assistant, East Chicago Sanitary District
- l. October 28, 2020 correspondence from Michael Radcliffe, Senior Manager Environmental Compliance, Safety Kleen Systems, Inc. to Henry Padilla, Pretreatment Assistant, East Chicago Sanitary District
- m. September 16, 2020 correspondence from Michael Radcliffe, Safety Kleen Systems, Inc. to Henry Padilla, Pretreatment Assistant, East Chicago Sanitary District
- n. August 20, 2020 correspondence from Michael Radcliffe, Senior Manager Environmental Compliance to Henry Padilla, Pretreatment Assistant, East Chicago Sanitary District
- o. June 17, 2020 correspondence from Michael Radcliffe, Senior Manager Environmental Compliance to Henry Padilla, Pretreatment Assistant, East Chicago Sanitary District
- p. May 6, 2020 correspondence from Michael Radcliffe, Senior Manager Environmental Compliance to Henry Padilla, Pretreatment Assistant, East Chicago Sanitary District

- q. April 30, 2020 correspondence from Michael Radcliffe, Senior Manager Environmental Compliance to Henry Padilla, Pretreatment Assistant, East Chicago Sanitary District
- r. March 12, 2020 correspondence from Michael Radcliffe, Senior Manager Environmental Compliance to Henry Padilla, Pretreatment Assistant, East Chicago Sanitary District
- s. February 7, 2020 correspondence from Michael Radcliffe, Senior Manager Environmental Compliance to Henry Padilla, Pretreatment Assistant, East Chicago Sanitary District
- t. November 5, 2019 correspondence from Michael Radcliffe, Senior Manager Environmental Compliance to Henry Padilla, Pretreatment Assistant, East Chicago Sanitary District
- u. October 7, 2019 correspondence from Michael Radcliffe, Senior Manager Environmental Compliance to Henry Padilla, Pretreatment Assistant, East Chicago Sanitary District
- v. September 24, 2019, correspondence from Michael Radcliffe, Senior Manager Environmental Compliance, Safety-Kleen Systems, Inc. to Nickie Geros, Pretreatment Coordinator, East Chicago Sanitary District
- w. August 16, 2019 correspondence from Michael Radcliffe, Senior Manager Environmental Compliance to Nickie Geros, East Chicago Sanitary District
- x. July 10, 2019 correspondence from Michael Radcliffe, Senior Manager Environmental Compliance to Henry Padilla, Pretreatment Assistant, East Chicago Sanitary District
- y. June 18, 2019 correspondence from Michael Radcliffe, Senior Manager Environmental Compliance to Henry Padilla, Pretreatment Assistant, East Chicago Sanitary District
- z. April 29, 2019 correspondence from Michael Radcliffe, Senior Manager Environmental Compliance to Nickie Geros, Pre-Treatment Coordinator, East Chicago Sanitary District
- aa. January 28, 2019 correspondence from Michael Radcliffe, Senior Manager Environmental Compliance to Nickie Geros, Pre-Treatment Coordinator, East Chicago Sanitary District
- 4. June 9, 2021 email sent from Jennifer Campbell, Indiana Department of Environmental Management to Jose Cisneros, East Chicago Sanitary District
- 5. East Chicago Sanitary District Permits:
  - a. Permit No. 901, issued to Safety Kleen Systems (effective date: November 15, 2018)
  - b. Permit No. 312, issued to Electric Coating Technologies LLC (effective July 15, 2013)
- 6. May 10, 2021 correspondence from Natalie Maupin, Pretreatment Compliance Coordinator to Kenneth Myers, Director, East Chicago Sanitary District
- 7. Safety-Kleen Instrument Calibration Certificates (by test date)
  - a. March 23, 2021

- b. March 24, 2020
  - c. April 22, 2019
- 8. Emerson Field Services, Magmeter—Transmitter Test Results, 8714D Flow Simulation Report (for Safety-Kleen Corp.), by date:
  - a. March 24, 2020
  - b. March 23, 2019
- 9. Safety-Kleen Systems—Outfall 901, Monthly Discharge Volume Reports, by date completed:
  - a. June 1, 2020
  - b. May 1, 2021
  - c. April 1, 2021
  - d. March 1, 2021
  - e. February 1, 2021
  - f. January 4, 2021
  - g. December 1, 2020
  - h. November 2, 2020
  - i. September 1, 2020
  - j. August 3, 2020
  - k. July 1, 2020
  - l. June 1, 2020
  - m. May 1, 2020
  - n. April 7, 2020
  - o. March 2, 2020
  - p. February 3, 2020
  - q. January 3, 2020
  - r. December 2, 2019
  - s. November 1, 2019
  - t. October 1, 2019
  - u. September 3, 2019
  - v. August 1, 2019
  - w. July 1, 2019
  - x. June 3, 2019
  - y. May 1, 2019
  - z. April 1, 2019
  - aa. March 1, 2019
  - bb. February 4, 2019
  - cc. January 3, 2019
- 10. East Chicago Sanitary District Industrial User Pretreatment Inspection Reports:
  - a. May 18, 2021 inspection of Linde, Inc.
  - b. November 14, 2019 inspection of Safety-Kleen Systems, Inc.
- 11. Laboratory Analysis Reports:

- a. February 22, 2021 correspondence from Samantha Packard, Project Manager, Element Materials Laboratory to Henry Padilla, East Chicago Sanitary District (Re #901)
  - b. August 31, 2020 correspondence from Andrew Etter, Project Manager, Element Materials Laboratory to Nickie Geros, East Chicago Sanitary District (Re: CAT-901)
  - c. January 22, 2020 correspondence from Ryan Fitzwater, General Manager, Element Materials Laboratory to Nickie Geros, East Chicago Sanitary District (Re: S-901)
  - d. January 23, 2019 correspondence from Dave Bryant, Project Manager, Microbac Laboratories to East Chicago Sanitary District (Re: Industrial User #901 011519)
12. Safety-Kleen Systems, Inc., Slug Control Plan (December 2018)
13. Blank form: East Chicago Sanitary District, Industrial Pretreatment Inspection Report